

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CYWEE GROUP LTD.,

Plaintiff,

v.

MOTOROLA MOBILITY LLC,

Defendant.

CASE NO. 1:17-cv-00780-RGA

JOINT STATUS REPORT

JURY TRIAL DEMANDED

Pursuant to the Court's oral order dated December 21, 2020, Plaintiff CyWee Group Ltd. ("CyWee Group") and Defendant Motorola Mobility LLC respectfully submit the following joint status report:

In the instant case, CyWee asserts infringement of claims 1, 3–5, 14–17, and 19 of U.S. Patent No. 8,441,438 ("the '438 patent"), and claims 10 and 12 of U.S. Patent No. 8,552,978 ("the '978 patent"). On January 14, 2019, the Court stayed this action pending final resolution (including appeals) of IPR2018-01257 and IPR2018-01258 filed by Google LLC (the "Google IPRs").

As shown in the table below, on January 9, 2020, the PTAB held that the claims subject to the Google IPRs are invalid:

Asserted Patent	IPR Case No.	Claims Held Invalid
8,441,438	IPR2018-01258	1, 3–5
8,552,978	IPR2018-01257	10, 12

CyWee appealed the PTAB's final written decisions in the Google IPRs to the Federal Circuit and those appeals (Case Nos. 2020-1565, 2020-1567) are currently pending. Oral argument has been scheduled for January 4, 2021.

Asserted claims 14–17 and 19 of the '438 patent are not subject to the Google IPRs. Those claims are however subject to an IPR filed by ZTE (the “ZTE IPR”), as shown in the table below:

Asserted Patent	IPR Case No.	Instituted Claims
8,441,438	IPR2019-00143	1, 4, 5, 14–17, 19

Additionally, amended claims are proposed in the ZTE IPR. Oral argument took place on November 18, 2020. On November 4, 2020, the PTAB issued an order in the ZTE IPR, which adjusted the due date for it to issue a final written decision to January 18, 2021.

Dated: December 28, 2020

Respectfully submitted:

STAMOULIS & WEINBLATT LLC

/s/ Stamatios Stamoulis

Stamatios Stamoulis #4606
stamoulis@swdelaw.com
Richard C. Weinblatt #5080
weinblatt@swdelaw.com
Two Fox Point Centre^[1]_{SEP}
6 Denny Road, Suite 307
Wilmington, DE 19809
Tel: (302) 999-1540

Michael W. Shore (Texas 18294915)
Alfonso G. Chan (Texas 24012408)
Christopher Evans (Texas 24058901)
Ari B. Rafilson (Texas 24060456)
William D. Ellerman (Texas 24007151)
Paul T. Beeler (Texas 24095432)
SHORE CHAN DEPUMPO LLP
901 Main Street, Suite 3300
Dallas, Texas 75202
Telephone (214) 593-9110
Facsimile (214) 593-9111

Attorneys for Plaintiff CyWee Group Ltd.

POTTER ANDERSON & CORROON LLP

/s/ David E. Moore

David E. Moore (#3983)
dmoore@potteranderson.com
Bindu A. Palapura (#5370)
bpalapura@potteranderson.com
Stephanie E. O'Byrne (#4446)
sobyrne@potteranderson.com
Hercules Plaza, 5th Floor
1313 N. Market Street
Wilmington, DE 19801
Tel: 302) 984-6000

Stephen M. Hankins
RILEY SAFER HOLMES & CANCELA LLP
456 Montgomery Street, Floor 16
San Francisco, CA 94101
Tel: (415) 275-8550

Attorneys for Motorola Mobility LLC